

IN THE CIRCUIT COURT OF MARYLAND FOR PRINCE GEORGE'S COUNTY

Barbara West
1514 Chillum Road
Apartment 203
Hyattsville, MD 20782

Plaintiff,

vs.

Giancarlo Bonilla
628 Mississippi Avenue
Silver Spring, MD 20910

Jamal Walker
10501 Babbling Brook Court
Upper Marlboro, MD 20772

Washington Metropolitan Area
Transit Authority (WMATA)
600 5th Street, NW
Washington, DC 20001

Defendants.

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COMPLAINT

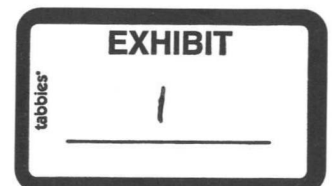
NOW COMES the Plaintiff, Barbara West (hereinafter "Plaintiff"), by and through undersigned counsel, and complains as follows:

JURISDICTION

1. That this Court has jurisdiction over this matter pursuant to the Maryland Rules of Civil Procedure.

PARTIES

2. That the Plaintiff, Barbara West, is a resident of Prince George's County, Maryland.
3. That the Defendant, Jamal Walker, is a resident of Prince George's County, Maryland.



4. That the Defendant, WMATA, is a quasi-governmental entity that does business in Prince George's County, Maryland.
5. That the Defendant, Giancarlo Bonilla, is a resident of Montgomery County, Maryland.

COUNT 1 - NEGLIGENCE

6. That on June 6, 2015, the Plaintiff was a passenger on a WMATA bus that was driven by Defendant Jamal Walker and headed southbound in the 1500 block of North Capitol Street, NW, Washington, DC.
7. That on the same date and at or around the same time, Defendant Giancarlo Bonilla was operating his vehicle and traveling in the same direction on North Capitol Street. Defendant Giancarlo Bonilla made a lane change in front of the WMATA bus and the two vehicles collided.
8. That, at all relevant times herein mentioned, the Defendants Walker and Bonilla owed the Plaintiff a duty to operate their vehicles in a safe and prudent manner, in compliance with the Maryland motor vehicle laws.
9. That Defendant Walker and Defendant Bonilla each breached the duty he owed to the Plaintiff by failing to pay full-time attention, failing to yield the right of way, failing to operate his vehicle in a safe and prudent manner, or otherwise failing to obey the District of Columbia rules of the road, and caused the afore-mentioned collision.
10. That, as a result of these Defendants' negligence and the collision caused therefrom, the Plaintiff suffered serious bodily injury, pain and economic loss.

WHEREFORE, the premises considered, the Plaintiff prays:

1. That this Court award the Plaintiff compensatory damages against Defendants Walker and Bonilla in the amount of \$ 30,000.00, jointly and severally, with interest and costs.
2. That this Court award the Plaintiff such other and further relief as it deems necessary.

COUNT 2 - RESONDEAT SUPERIOR


13. That the Plaintiff re-alleges and incorporates by reference, Paragraphs one (1) through ten (10) of the Complaint.
14. That at all relevant times herein mentioned, Defendant Jamal Walker was employed by WMATA, he was operating WMATA's vehicle with WMATA's consent, he was pursuing

WMATA's business interest, and was acting within the scope of his employment when the accident at issue occurred.

WHEREFORE, the premises considered, the Plaintiff prays:

1. That this Court award the Plaintiff compensatory damages against Defendant WMATA in the amount of \$ 30,000.00, with interest and costs.
2. That this Court award the Plaintiff such other and further relief as it deems necessary.

Respectfully submitted,



William H. Jackson, Esquire
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JURY TRIAL

The Plaintiff demands a trial by jury.



William H. Jackson, Esq.